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California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

[Submitted electronically via capandtrade13 Board Item at <http://www.arb.ca.gov/lispub/comm/bclist.php>]

Subject: Additional Comments for PUBLIC HEARING TO CONSIDER AMENDMENTS TO THE CALIFORNIA  
CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS –  
Tissue Product-Based Benchmark

Chairman Nichols and Members of the Board:

The Procter & Gamble Paper Products Company (P&G) appreciates the opportunity to comment on CARB's 2013 Proposed Regulation Amendments on product-based benchmarks associated with CARB's Initial Statement of Reasons (ISOR) for the Cap-and-Trade Regulation posted on September 4, 2013. P&G has a manufacturing facility in Oxnard, where we manufacture Bounty paper towels and Charmin toilet tissue, and distribute our product throughout the western United States.

We wish to provide the enclosed comments to Appendix C – New and Modified Product-Based Benchmarks.

**Proposed Regulations Amendments – Tissue Product Benchmark, Appendix C**

The Procter & Gamble Paper Products Company recognizes the considerable effort CARB has invested in compiling extensive and detailed data to develop the proposed amendment which is consistent with existing benchmark principles. We agree that water absorption capacity is the most important functional characteristic for tissue and towel products and believe that the proposed amendment for tissue manufacturing is analytically based, logical and fair for tissue facilities. For all of these reasons, we support CARB's proposed amendment to apply the Equivalent Factor (EF) and adjust tissue production by water absorbency capacity so that the benchmark is short tons of tissue that hold the same amount of water.

We thank the Board and CARB staff for their work on updating the tissue product benchmark and for the opportunity to provide these comments on the tissue product benchmark revisions.

Respectfully,

Kara Roeder  
Plant Manager, Oxnard  
The Procter & Gamble Paper Products Company